

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

International Union of Operating Engineers,	)	
Local 150, AFL-CIO,	)	
	)	
Plaintiff,	)	Case No. 20-CV-389
	)	
vs.	)	Judge: Charles P. Kocoras
	)	
Grosshening, Inc. d/b/a Grosshening	)	Magistrate Judge: David M. Weisman
Industrial Service Company,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF FINAL JUDGMENT AND ORDER**

Plaintiff International Union of Operating Engineers, Local 150, AFL-CIO (“Local 150” or “Union”) files this Motion for Entry of Final Judgment and Order against Defendant Grosshening, Inc. d/b/a Grosshening Industrial Service Company (“Grosshening”), for unpaid Joint Grievance Committee (“JGC”) awards under Fed. R. Civ. P. Rules 54 and 58. In support of its motion, Local 150 states as follows:

1. On January 17, 2020, subsequently amended on February 24, 2020 and May 28, 2021, Local 150 filed suit against Grosshening to collect unpaid JGC awards owed under its collective bargaining agreement with the Union.

2. On May 17, 2022, after motions for summary judgment had been fully briefed, the Court issued a Memorandum Opinion finding in favor of Local 150 as to Count I regarding grievance number 15-2-087 in the amount of \$2,295.67; Count II regarding grievance number 16-2-068 in the amount of \$2,295.67; and Count III regarding grievance number 19-2-047 in the amount of \$16,074.72 (Dkt. #82).

3. An issue of attorneys’ fees and costs has arisen and therefore Plaintiff should be allowed to pursue its attorneys’ fees pursuant to Fed. R. Civ. P. 54 and Local Rule 54.3.

WHEREFORE, Local 150 respectfully requests that the Court enter Final Judgment in its favor for the first three unpaid grievance awards in the amounts set forth below:

Count I – Grievance No. 15-2-087	\$2,295.67
Count II – Grievance No. 16-2-068	\$2,295.67
Count III – Grievance No. 19-2-047	\$16,074.72
<b>Total:</b>	<hr/> <b>\$20,666.06</b>

and allow Plaintiff to pursue its attorneys’ fees. Defendant is to bear its own attorneys’ fees and costs.

Dated: October 5, 2022

Respectfully submitted,

By: s/ Steven A. Davidson  
One of the Attorneys for the Plaintiff

Attorneys for Local 150:

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that on October 5, 2022, he electronically filed the foregoing ***Motion for Entry of Final Judgment and Order*** and which sent notification to the following:

Jennifer L. Jones  
Christopher Johlle  
Christopher A. Johlle  
Littler Mendelson, P.C.  
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By: s/ Steven A. Davidson  
\_\_\_\_\_  
One of the Attorneys for Plaintiff

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